

NOVEMBER 2024

**Voice for Walcha
Group Submission
Winterbourne Wind EIS
Amendment Report**



Executive Summary

The objective of this communication is to summarise and contextualise a **Community Response** ('Response') to **ERM's Submissions Report** submitted on behalf of Winterbourne Wind 20 September 2024 and **ERM's Amendment Report** of 3 October 2024. On review of both Reports, Voice for Walcha on behalf of the Community, doesn't perceive that any suggested amendments dramatically reduce the Project's impact on Walcha and its community. ERM with as much poetic licence as they can muster try to paint a picture of 'amendment'. Presumably most of the proposed 'relocation/refinement' has been necessitated by the loss of hosts, and the addition of two more associated landowners. The amended impact of this project remains significant and therefore unacceptable to the Community more broadly. It remains an unsound aberration of the project originators and a poor site selection by the Developer – Vestas.

This Community Response doesn't seek to modify Voice for Walcha's (VfW) detailed conclusion of January 2023 Voice for Walcha (VfW) Group Submission (including 11 sub-submissions) on the EIS. Therefore for the purposes of informing DPHI's¹ subsequent Assessment Report and Recommendations to IPC² please note VfW and the majority of the **Communities ongoing objections to the project still stand**.

The Community's Response has been prepared with regard to the State Significant Development Guidelines 2024 and the associated Appendix C on preparing a submissions report.

- **Firstly**, VfW doesn't believe that ERM's Submission Report adequately address the EIS issues and concerns tabled in VfW Community Group Submission tabled in January 2023. The Submission Report feedback to the Community is lite, and with respect somewhat superficial and inconsistent with the intention of the Guidelines and the related Appendix C prescription. The Community need through meaningful consultation the requisite detail – what turbines were moved and for what reason? As a read it further confirms what the community believe is a turbine salesmen here today – gone tomorrow proposition.
- **Secondly**, VfW is concerned that the Developer deliberately and/or negligently abused the development process by tabling an incomplete and misleading EIS. This we claim on behalf of the Community was procedurally unfair – a breach of the natural justice NSW planning governance is supposed to respect. The approach to community participation and the tabling of an unfinished – therefore misleading EIS clearly impeded the Community and many other agencies the ability to properly assess the merits of some critically important aspects of the EIS. The grievance associated with this procedural unfairness is a serious issue for Government and its planning governance and is picked up hereunder.

¹ Department of Planning Housing and Infrastructure

² Independent Planning Commission

Context to the Communities Response

It is important to offer some context on the key considerations underlying the Community's ongoing objection.

- The Developer *Vestas* – despite 5 requests for extension to submissions response has done very little to prosecute the argument in favour of a consent. The Project DNA hasn't changed, it remains a wind turbine manufacturer trying desperately to masquerade as a developer, in the hope that someone – anyone will take the project off their hands. **ERM's Winterbourne Wind Farm (WWF) Submissions Report** does its best to narrate the semblance of a project amendment through a gaggle of synonyms, reconfiguration, realignment, relocation, avoidance and the *illusion of minimised impact*. However, when analysed in the light of day they offer more questions than answers. In reality it conveys the 'same wine – *different bottle*' – just new spin in an attempt to allure an unsuspecting buyer and another tick in the development box for the 'tickmaster' the DPHI.

Rather than genuine 'reconfiguration' presumably after actual community consultation - the Developer having lost one host has just 'squeezed the development like a half inflated hot air balloon' – over a smaller project footprint – just bunching more turbines over the same project area. The Developer on questioning by the VfW at the 2024 Walcha Show offered no substantive reason for the reconfiguration – such as perhaps community feedback or biodiversity sensitivities.

Consistent with the Developer's online financial outlook alluded to immediately hereunder there appears to be a number of reasons for Vestas's fragile profitability. These, according to the Global CEO include slow project permitting. We assume pressure is on the development team to expedite, save costs, cut corners in order to get project permitting – a follow on turbine sale and an expensive O&M contract over multiple decades.

- This Developer DNA against the backdrop of the faltering transition to renewable energy would suggest that wind economics is struggling for air at the moment. Analysis of Vestas Wind Systems A/S publicly available financial results second quarter 2024 suggest a negative operating EBIT, before special items of \$185million euro (<https://www.vestas.com/content>). This builds on a 115-million-euro loss from the same period last year.

Inflationary pressure and supply change challenges suggest that supply and install turbine costs have escalated by up to 40% since 2021 and the back of plant perhaps by more.

This outlook against increasing criticism of AEMO's ISP³ transition cost assumptions and unstable revenue offtake opportunities suggest that serious questions should be asked about WWF economic viability and consequentially whether it, as a highly subsidised development, remains in the **public interest**.

Notwithstanding, the suggested output of say 2.1m MWh/PA, the cost to build say on or around \$2.4b against the prevailing offtake market – it's hard to see how this project puts any downward pressure on NSW energy prices? The reality for the Developer is they have

acquired a poorly selected, probably increasingly unbankable site, abound with fatal flaws and project risks. The fact that there is now a 22 month extension to the construction timetable (to 52 months) and that we may not see one cent of the seriously unnourished VPA⁴, the Developer is proving to be hollow on promise. How can the Community take seriously their commitment to decommission or to honour their VPA? On paper it is open to interpret the Developer has stitched their Hosts with potentially 62 years of options over their land. As highlighted hereunder apart from providing some hosts with an income and the 'aspirational target' of 130 jobs during construction from a community already at full employment – there is no economic windfall for the broader Community. That's the obvious lesson from other communities.

- VfW sense is that in the 20 (twenty) months since submissions closed the general community outlook **against** the Winterbourne Wind Farm has intensified with an increasing percentage over and above the original 79% of the adult community now **firmly opposed**. Perhaps this outlook is now validated by questions as to the lack of 'signatures on a page' for the close neighbour project of Ruby Hills. The ERM Submissions Report is somewhat reckless in its interpretation 'on balance' of public submissions. It is acknowledged that the developer and their friends 'broader community' solicited supporting submissions from a variety of individuals who had *no knowledge of the project* nor potentially *any knowledge of where Walcha even was* or nor obviously what its socio-economic credentials. The reality is there was 429 submissions made from individuals **less than 100 kms** of which 317 or **74% were objectors**. Of the remaining supporters (less than 100kms), 21% of these where from individuals with a *financial interest*.
- VfW had assumed in accordance with Section 7 State Significant Development Guidelines that the Developer would respond to the issues raised in the Submissions to the EIS "... **To ensure that the community gets feedback ...**". The VfW submissions to the EIS tabled over 130 pages of Objections many of these were based on **points of law, expert opinions offered** and just **missing incomplete information** in a largely unfinished and therefore misleading EIS. We have already questioned how ERM could honour it's REAP declarations.

As extracted from the VfW Group EIS Submission there were key threshold issues of law arising from the principles of **natural justice – procedural fairness** which we allege the Developer has flouted the planning pathway.

The Sub-Submissions hereunder promote detailed consideration in each of its 11 assessments outlining 2 shortcomings – firstly, failure to achieve compliance and/or secondly, excessive and unacceptable impacts. Some of which are critical. Each attempt is to substantiate **why consent should be** withheld for the Project. Much of the basis for this conclusion is derived from the following threshold technical conclusions reached by VfW on behalf of the Community.

- i. The considerable project impacts and the mitigation offered don't confirm as ecologically sustainable development in accordance with the Objectives of the NSW Environmental Planning and Assessment Act 1979.

4 Voluntary Planning Agreement

- ii. The project impacts on the UNESCO Gondwana Rainforest and Wilderness Area and the rich biodiversity do not justify approval by the Federal Minister of the Environment pursuant to the Environment Protection Biodiversity Conservation Act 1999.
- iii. The Proponents presentation of the EIS is unacceptably deficient in project detail - it presents with numerous errors and misleading information. It's content and technical detail is clearly not in compliance with the EPA Act 1979 and Schedule 2 of the EPA Regulations. Nor does it reflect the standards espoused by the State Significant Development Guidelines July 2021 and the Preparing an Environmental Impact Statement Guidelines - July 2021.⁵

Has the Community been afforded procedural fairness?

Obvious and concerning questions as to **procedural fairness** arise for the Community and others who were clearly impaired in their opportunity to assess the merits of the Project through this EIS Process. The need for the EIS to be of a high standard containing technically robust assessment is well documented in the Planning Guidelines. A plethora of submissions objecting to the project made similar complaints as to the poor and unfinished nature of the presented EIS. The Community doesn't dismiss the hypothesis that the Developer Applicant deliberately promoted an incomplete EIS either to save money or facilitate a fast-tracked process. The Community were left, through their submissions, with task of identifying missing assessment issues or merit impacts. Today we say this effectively allowed the Developer to swing back through the Response to Submissions process and fill in the gaps in a much more modified or succinct, and therefore to them, in a cost-effective manner. Essentially a shortcutting of the process promoting a quicker turnaround on Vestas's well documented permitting woes. Whatever the rationale is, the Community have been denied proper process on many issues they were denied detailed information needed to make a proper assessment as to merit. The Community has been offered no feedback or denial or otherwise on this serious issue.

In the interim between lodging VfW Group Community Submission at closing in January 2023 – the Developer Applicant has been granted on **five separate occasions**, 28 April 2023, 15 December 2023, 29 March 2024, 29 June 2024, 30 August 2024 an extension on their Response. They finally delivered on 20 September 2024 a Submissions Report – an Amendment Report and 12 separate Amendment Reports covering over 1050 pages (plus tables and annexures) allegedly amending their unfinished and misleading EIS.

The Community has 28 days in which to digest, assess and respond to a \$2.4 billion development project that 20 months ago was a half-baked EIS. **We ask the Government how is this procedural fair ?** Answer: it's not it's either incompetence or an odorous stitch up or both.

⁵ VfW Group Submission to Winterbourne Wind EIS - January 2023

Comments on Suggested Project Amendments

As well documented above, the Applicant is a transitional Developer in name only – the business model – the intent is to sell the development rights as soon as a purchaser takes the bait. In the meantime, the Community is having to make sense and respond to a Project Proposition which wallpapers over Public Interest and clearly falls well short on merit as to **Traffic and Transport, Biodiversity, Visual Impact, Water and Gravel, Noise, ACHAR, Social Advantage, Cumulative Impacts and Community Benefits.**

1. Traffic and Transport

The realisation that Oxley Highway as an OSOM access route to the proposed development which was clearly obvious the Walcha community – was never an option.

- i) The Community needs **now to fully understand** the amended OSOM Route via the New England Highway to Staces Road – the new road proposals and entry onto Thunderbolts Way.
- ii) The Community also needs to fully understand proposals to use local roads both sealed and unsealed

The proposed traffic outlook particularly during construction is an horrendous imposition on the liveability, workability and general health and safety of the Communities of Walcha and Uralla. This Community Response recommends three things should occur immediately.

- iii) The Amended TIA⁶ should be put on public exhibition for 28 days. It presents as a total revision as to what the Community were led to believe in the EIS particularly on OSOM movements
- iv) The Developers and their Consultants should conduct a public forum outlining their assumptions; and
- v) Briefing Sessions should be expedited with each Council – It is noted WSC has not been updated since March 2024 and Uralla more recently September 2024.

2. Biodiversity

- i) **Reconfiguration** - Transparency and Validation. The Community in the absence of transparency and validation assumes the removal of the one host has necessitated some reconfiguration with the removal of 9 (nine) parcels of land – the result appears to be a bunching of additional turbines on allocations immediately west of the North Substation and the allocation of additional turbines immediately north of the same substation and Blue Mountains Road. On going reconfiguration and fine-tuning micro siting of proposed sites is normal practice in wind developments however it is important that transparent reasons are offered. So, to suggest amendment justification was based on biodiversity, on visual, on noise or on aboriginal cultural heritage in the case of

⁶ Transport Impact Assessment

WWF needs validation (See LVIA). It is assumed that the Developer will try and conveniently leverage this alleged sensitivity to neighbours indigenous community and non-indigenous community to colour the story for DPHI and IPC. We would have assumed that the Developer was keen to share such accommodations – apparently not so.

- ii) The suggestion that one or two turbines were moved to 600M from the National Park boundary is not acceptable. The Community maintain their strong support for the Recommendation of a 10km no development buffer zone around Oxley Wild Rivers National Park.
- iii) The Community remains sceptical as to the revised impacts on New England Peppermint Grassy Woodlands and the other species identified in the Disturbance Footprint. This scepticism also applies to the developers' other claims regarding reduction in spotted – tail Quoll Koala Squirrel Gilder and Glossy – Black Cockatoo. All of this scepticism remains high on our agenda with the Federal Government pursuant to the EPBC Act 1999.
- iv) The Community needs to remind the Developer that its Group Submission was particularly ardent in its concerns for bird strikes – hence the importance of the Expert Peer Review and the strength of our advocacy as to incomplete surveys of Bird and Bat, inconsistency and confusion between risk assessments and they are still unfinished. We can go on ad nauseam as to the paucity of the Developers submitted response and the failure to address the requests for additional information. The Developer should understand **Biodiversity remains a major issue for this project**. The Developer made the decision to develop a site with 118 x 6.2MW 230M wind turbines right next to a major national park and world heritage listed public asset. The Developer should expect that the Community, and every Australian, will hold them to account to ensure strict compliance with the EPBC Act 1999, NSW Environmental Planning and Assessment Act 1979, the National Parks and Wildlife Act 1974, the Wilderness Act 1987, NSW Biodiversity Conservation Act.
- v) In terms of Developer's claim on the relocation of 21 turbines and the refinement of 52 turbines – the Community needs certainty if it is to assess this claim as believable. The Developer needs to identify of each of these turbines what was the impact they were seeking to mitigate – was it reduction in biodiversity impact? or was it to improve constructability of hard stands and access tracks? It is not evident in the Amended BDAR.

3. **Visual Impact**

It is hard to accept that the 'bunching' impact induced by the alleged amendments to configuration and siting have not induced an increased visual magnitude. It is hard to envision how the deletion of turbines B024 and B123 and the relocation of 230m turbines B024, B025, B026, B027 closer to Walcha presumably from Yalgoo have reduced visual impact. It is a total nonsense to conclude that the inclusion of SR087, SR088, SR274 and SR282 as associated dwellings **now somehow reduces visual impact**.

Seriously this is a very large development on the prevailing landscape – the Developer can wax on through convenient ‘consultant speak’ as to multiple wind turbine tools and zones of visual influence the reality is the change to the visual landscape from this project will be significant – the Amendments offer zero comfort and confirm the Developers penchant to distort the reality. Assume the Developers Amendments are rejected, and the Community will fight hard through the EPA Act and Planning Guidelines to maintain the integrity of its pristine landscape.

4. **Water and Gravel**

The Community quite rightly was at pains to point out in it's VfW Group Submission the paucity of planning and due diligence the Developer initiated in contemplating the water and gravel needs of this Project. Obviously, they are substantial, and the Developer expects the ‘nickel and dime’ band aid solutions identified in its response to somehow mitigate in favour of the project.

1. **Firstly**, as to Water it is little comfort that the Developer now comes to the table with water balance models – Gold Sim software – this is just ongoing spin. What the Community does agree with in terms of the proposed quarry demand is that supply will be deficit and significant imports will be required. It would seem the Developer's proposed WMS is fanciful and devoid of reality and development experience. Assume the Community rejects out of hand the Amendment conclusion and assume the Community intend to hold the Developer to account on any Macleay River Catchment obligations and any extractive licencing activities pursuant to the NSW POEO Act 1997. This resourcing requirement will need to be crystal clear in any DPHI assessment and/or reference to the IPC.
2. **Secondly** as to Gravel the second unacceptable band aid solution proposed by the developer is an onsite quarry. This proposition is alarming to the community from a number of perspectives;
 - **It's temporary** – of course it is – it will struggle to present a solution to the expected demand – the Developer says 500,000 tonnes per year. As we are sure the Developer has already gleaned the five alternatives commercial quarries < 400Km are already constrained as to resource and access.
 - The Community rejects the Developer's proposition that it be approved as an amendment to the existing WWF application. Clearly it requires separate development approval – from a number of impact perspectives – visual, noise, dust, increased traffic it will be opposed vigorously by the Community. This Quarry, temporary or not, is not an Amendment to the existing Application – it's a new Project requisite of its own approval process – it's not referenced in the Request for SEAR, in the issued SEAR or in the EIS; and
 - The Community remains sceptical, it needs to sight reports on the detailed site geological and geotechnical investigations.

5. Noise

The Community out of concern for health and wellbeing of the Walcha Community took the necessary step of securing Peer Review of the original Sonus Noise Assessment. This Peer Review was undertaken by L. Huson and Associates (LHA) who is well known within 'industry' and to Sonus.

The bottom line is the Peer Review didn't conclude at all that well to the Developers interpretation. The Peer Review highlighted a potential for at least a significant underestimation of the noise impact in the project's community **by at least 14dB**.

This underestimation of community sound levels does not include side effects that can further increase actual sound levels or the possibility of including a penalty for tonality if test results show tones are present for the actual turbine used.

In response, the Developer's consultant the same Sonus references both the South Australian 2009 and 2021 Guidelines which enable the NSW 2016 Noise Bulletin. They seem to be the same. It further seems we have a configuration or layout the Developer appears to be advocating is final. *Is this correct?* We seem to be settled that the turbine of choice is the Vestas 162 6.2MW. *Is this correct?* We have gone back to LHA on the noise modelling and until we can safely conclude otherwise Sonus's compliance predictions **remain uncertain, potentially deficient and incomplete**. We perceive this may be particularly the case now that the Developer has tabled a 'bunched configuration' where readings maybe be influenced by closer spaced turbines.

By way of response, the Community is determined to avoid a situation where the turbine salesmen have passed the nuisance burden onto an incoming purchaser or the situation where the turbines are installed, and the EPA is trying post construction to validate doggy noise predictions. This is not going to happen. All parties have to be conscious of the need to avoid another disaster like Bald Hills or the potential for class actions.

6. ACHAR

The non indigenous community is going to let the Dunghatti Community speak for itself. We offer from our observations only one word to describe the Developers approach – **tokenism**.

7. **Social Economic Advantage**

It was patently obvious to most rural and regional communities including Walcha that the promised economic nirvana from the energy transition was Macquarie Street spin. Very little has changed, and this is most demonstrable in the Response to Submissions and the Amendment Report. The variation is the Developer has replaced an EIS assessment undertaken by an academic who never visited Walcha with an expensive amendment spin doctor from ERM.

In essence they both were spinning academic 'La La Land' which might present as convenient messaging for Hosts and Council but remains devoid of reality. Baseline considerations, vulnerability impacts, aspirational targets so on and so forth are nonsense gobble gook. Any engagement with the Community will immediately reveal the Community's aspirations are to maintain a standard of **liveability and workability** which they have worked hard to achieve. The social outcome they seek is the ability to take their children to school and sport and their parents to medical care. A reasonable aspiration is to do so in a timely and safe manner. Aspirational they don't seek to sleep in the boot of car⁷, sleep deprived through turbine noise nor be disturbed by blade flicker or worry about blade throw. With respect, assessing community cohesion is a drivel, essentially 'blind freddy' can tell you there isn't any. The project originators Walcha Energy, aided and abetted by Walcha Wind, the Hosts and the Developer, punched a big hole in that characteristic with non-disclosure agreements and the like some years ago.

Yes, during construction phase there may be a big workforce, but it won't reside in Walcha and won't spend in Walcha and move on post construction leaving a small contingent of mainly FIFO FTE to monitor and guard the access roads. No seam of gold here.

The socio-economic outlook suggests tourist revenue will evaporate as the New England Highway and Thunderbolts Way will be choked for years and visitors won't be captivated by the allure of 230m wind towers 650m from the Gondwana World Heritage Area.

8. **Cumulative Impact**

The Developers Project Office, manned or unmanned, is directly opposite the Walcha Energy (now Origin Energy) office. It's reasonably foreseeable that as Walcha Energy were developing Ruby Hills Wind Farm some 146 WTG, it is extremely hard to concede that it wouldn't be contemplated in any cumulative impact assessment.

These projects together with Thunderbolts, Bendemeer, Salisbury Uralla, Hills of Gold and EnergyCo transmission lines, confirm Walcha will be one of the most intensively developed renewable energy precincts in Australia. Proper assessment of the cumulative impacts will be sobering.

⁷ Uren v Bald Hills Vic Supreme Court

9. Community Engagement Community Benefits Fund

This Response has already called into question the nonsense analysis offered on the Developer's Geographic Analysis and the Submission Categorisation. As to the suggestion that the Developer displayed anything other than a 'tick the box' disrespect for Community Participation is ludicrous. The engagement activity described in Table 3-1 of the Developer's Response might have on paper occurred – but right from the get-go – the engagement offered has *not be genuine – has not been informative*. The suggestion that feedback elicited from the Community has informed a reconfiguration of the project is a fairy tale. Information Days – Walcha Show – Uralla Street Stalls evidenced the Developer telling the Community what was proposed rather inducing or understanding feedback. Most demonstrable of this is the unmanned project office and the barren facebook page.

Moreover, the developer did not present these amendments to the community. Anyone who did not go to the Winterbourne stand at the 2024 Walcha Show would not have had any opportunity to have the amendments presented to them. Even if they did discuss the amendments with the consultants at the show, the amended timeline was not displayed or discussed even though **Winterbourne were fully aware of it**. It must be expected that the community must read the whole amendment report to understand the amendments. This is not fair process as we all know that is not going to happen. This is not fair process and is intentional on the part of Winterbourne Wind.

The Developer cites the **Community Benefit Fund** as an example of their engagement proactivity – the CBF hasn't changed structurally from the get-go – in 'a take it or leave approach'. Even the Hosts in verbal submissions to Council – confirmed there was no room to consider the view of the Council or of the Community's as "we 'Walcha Wind Pty Ltd' (5% equity partner in the Project) negotiated it and signed off with Vestas years ago". The sad reality is the Community may not see any benefit or draw down, not a cent, until the project is commissioned from the start of construction in 2027 till it is fully operational, no earlier than 2032, or if ever.

Quote:

"The operational payments for the community benefit fund will commence **when the whole wind farm has been commissioned**.

Kind Regards
Winterbourne Wind Team"⁸

Such a disingenuous deal negotiated by Walcha Wind which the Walcha Council seemed oblivious to. Such a poorly negotiated deal for the Community for which Walcha Wind should be held accountable. Council signed off despite 80 submissions from the community warning them **not to commit to the CBF**. So, the pattern is consistent – the Developer consults with the hosts and negotiates with the hosts through Walcha Wind, and the broader community seemingly gets thrown under a bus.

⁸ Email from Winterbourne Wind to V4W, 12/10/24

We don't doubt there has been regular contact with the DPHI – for a starter they have had to negotiate 5 (five) extensions to their Response to Submissions. We don't doubt they have had regular contact with the NSW BCS – after all they as the responsible biodiversity agency panned the EIS. This is replicated with TfNSW, Heritage NSW and for the same reasons. No doubt they had meetings and phone conversations with Energy Co as they alluded to – they had to dig themselves out of sizeable hole on transport and Energy Co were obviously keen to keep the lines of communication opened as the REZ Central South Hub, without Ruby Hills, was resembling a setting sun!

Conclusion

It is hard for Community not to be emotionally drained by this project – particularly reflecting on the key planning documents – the EIS – Response to Submissions – the Amendment Reports. They remain awash with misrepresentation, deliberate or negligent. They are all designed to paint a superficial tick the box picture of compliance as to form a convenient utilisation of a process orientated planning pathway. We see the reality of course is the substance of what they mean on the ground in terms of acceptable impacts on people, and their place and in an ecological sustainable development context. Analysis of each pertinent issue confirms a lack of merit against the objects of the Environmental Planning and Assessment Act 1979.

This conclusion is exacerbated by a blatant misuse of process. An abuse which leaves the Community constrained in trying to assess the merits and impacts of the development. The EIS is supposedly the cornerstone of NSW Planning Governance. The Developer in this project has sought to disadvantage the Community by having a second bite of the EIS process – this is a denial natural justice which should be called out by the Government.

Essentially as repeated throughout the Community's commentary – this is a poorly site selected project. A project which clearly compromises the agricultural landscape, it's road systems, it's treasured biodiversity. It needs to be seen for what it is - a sales pitch for turbines and an O&M contract. Strategically the Developer has failed to disguise the thin veneer of wallpaper over what is just a re-bunching of an old layout. It's pitch as to major amendment and environmental and social rationale is just misrepresentation and spin.

Finally, the obvious question that needs to be asked is one of public interest – the economics of this project need to demonstrate public benefit **that is not evident on the facts before the Community**. We see no obvious ability to put downwards pressure on energy pricing.

Voice for Walcha is a group of interested and passionate members of the community who value the local environment, the area and the people to such an extent, that we feel it is worth fighting for. **We currently have over 350 active members**, and as part of their membership, concur with the following statement ...
"I support the actions of Voice for Walcha, in their communications and activity, through my membership".

